

STATE OF WISCONSIN

CIRCUIT COURT

WAUKESHA COUNTY

BARBARA COLLINS,

Plaintiff,

and

DEPARTMENT OF HEALTH AND HUMAN SERVICES and
UNIFIED HEALTHCARE PLAN,

Involuntary Plaintiffs,

v.

BLUFF VIEW SENIOR LIVING CENTER and
PROTECT WISCONSIN INSURANCE COMPANY,

Defendants.

NOTICE OF MOTIONS AND MOTIONS IN LIMINE

PLEASE TAKE NOTICE that the defendants, Bluff View Senior Living Center and Protect Wisconsin Insurance Company, will appear in that branch of the Circuit Court of Waukesha County, presided over by the Honorable John W. Markson, and will appear by their attorneys, The Defense Firm, LLP, and will move the Court in limine for the following Orders:

1. To prevent expert testimony from any witness not previously identified and/or opinions not disclosed pursuant to a written report as ordered by the Court or by deposition testimony.
2. To prevent any witness from testifying to the truth, veracity or accuracy of the testimony of any other witness.

3. To prevent plaintiff's counsel from cross-examining with regard to possibilities, but allowing defendants to offer expert opinions to reasonable possibilities.

4. To prevent any witness from testifying with regard to the relative fault and/or percentage of negligence of any party.

5. To prevent plaintiff's counsel from reading from the medical records unless the appropriate foundation is laid.

6. To prevent plaintiff from offering evidence with regard to the past and/or future loss of earning capacity of the plaintiff.

7. To prevent plaintiff from offering any evidence of negligence that is not causal.

8. To prevent plaintiff from calling rebuttal witnesses.

Dated this _____ day of _____, _____.

THE DEFENSE FIRM LLP

By: I. Will Winston
State Bar No. 1111111
Attorneys for defendants Bluff View Senior
Living Center and Protect Wisconsin Insurance
Company